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3 (619)698-6800

4 Attorney for Debtors/Defendants  
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8 **UNITED STATES BANKRUPTCY COURT**  
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 In Re: ) Adversary No. **06-90506-H7**  
11 )  
11 **JEFFREY SCOTT TURPIN** and ) **ANSWER TO COMPLAINT TO**  
12 **BARBARA JEAN TURPIN,** ) **DETERMINE DISCHARGEABILITY**  
13 Debtors. ) **OF DEBT**  
14 )  
Bk No. **06-02852-H7** )  
15 )  
15 **2J GROUP, INC.,** )  
16 )  
16 Plaintiff, )  
17 v. )  
18 **JEFFREY SCOTT TURPIN** and )  
19 **BARBARA JEAN TURPIN,** )  
20 Defendants. )

21 Defendants, JEFFREY SCOTT TURPIN and BARBARA JEAN TURPIN,  
22 in answer to Plaintiff's Complaint on file herein, admit, deny and  
23 allege as follows:

24 1. Answering Paragraph 1, these answering Defendants  
25 admit the allegations therein contained.

26 2. Answering Paragraph 2, these answering Defendants  
27 admit the allegations therein contained.

1           3.    Answering Paragraph 3, these answering Defendants  
2 admit the allegations therein contained.

3           4.    Answering Paragraph 4, these answering Defendants  
4 admit the allegations therein contained.

5           5.    Answering Paragraph 5, these answering Defendants  
6 admit the allegations therein contained.

7           6.    Answering Paragraph 6, these answering Defendants  
8 admit the allegations therein contained.

9           7.    Answering Paragraph 7, these answering Defendants  
10 admit the allegations therein contained.

11          8.    Answering Paragraph 8, these answering Defendants  
12 admit the allegations therein contained.

13          9.    Answering Paragraph 9, these answering Defendants  
14 lack sufficient information and belief and on that basis deny the  
15 allegations set forth therein.

16          10.   Answering Paragraph 10, admit the allegations  
17 therein contained.

18          11.   Answering Paragraph 11, these answering Defendants  
19 deny, generally and specifically, each and every allegation set  
20 forth therein.

21          12.   Answering Paragraph 12, these answering Defendants  
22 deny, generally and specifically, each and every allegation set  
23 forth therein.

24          13.   Answering Paragraph 13, these answering Defendants  
25 lack sufficient information and belief and on that basis deny the  
26 allegations set forth therein.

27          14.   Answering Paragraph 14, these answering Defendants  
28

1 lack sufficient information and belief and on that basis deny the  
2 allegations set forth therein.

3           15. Answering Paragraph 15, these answering Defendants  
4 lack sufficient information and belief and on that basis deny the  
5 allegations set forth therein.

6           16. Answering Paragraph 16, these answering Defendants  
7 deny, generally and specifically, each and every allegation set  
8 forth therein.

9           17. Answering Paragraph 17, these answering Defendants  
10 lack sufficient information and belief and on that basis deny the  
11 allegations set forth therein.

12           18. Answering Paragraph 18, these answering Defendants  
13 deny, generally and specifically, each and every allegation set  
14 forth therein.

15           19. Answering Paragraph 19, these answering Defendants  
16 lack sufficient information and belief and on that basis deny the  
17 allegations set forth therein.

18           20. Answering Paragraph 20 these answering Defendants  
19 lack sufficient information and belief and on that basis deny the  
20 allegations set forth therein.

21           21. Answering Paragraph 21, these answering Defendants  
22 lack sufficient information and belief and on that basis deny the  
23 allegations set forth therein.

24           22. Answering Paragraph 22, these answering Defendants  
25 lack sufficient information and belief and on that basis deny the  
26 allegations set forth therein.

27           23. Answering Paragraph 23, these answering Defendants  
28

1 deny, generally and specifically, each and every allegation set  
2 forth therein.

3           24. Answering Paragraph 24, these answering Defendants  
4 admit the allegations therein contained.

5           25. Answering Paragraph 25, these answering Defendants  
6 lack sufficient information and belief and on that basis deny the  
7 allegations set forth therein.

8           26. Answering Paragraph 26, these answering Defendants  
9 admit the allegations therein contained.

10           27. Answering Paragraph 27, these answering Defendants  
11 lack sufficient information and belief and on that basis deny the  
12 allegations set forth therein.

13           28. Answering Paragraph 28, these answering Defendants  
14 admit the allegations therein contained.

15           29. Answering Paragraph 29, these answering Defendants  
16 deny, generally and specifically, each and every allegation set  
17 forth therein.

18           30. Answering Paragraph 30, these answering Defendants  
19 deny, generally and specifically, each and every allegation set  
20 forth therein.

21           31. Answering Paragraph 31, these answering Defendants  
22 deny, generally and specifically, each and every allegation set  
23 forth therein.

24           32. Answering Paragraph 32, these answering Defendants  
25 deny, generally and specifically, each and every allegation set  
26 forth therein.

27           33. Answering Paragraph 33, these answering Defendants  
28

1 deny, generally and specifically, each and every allegation set  
2 forth therein.

3           34. Answering Paragraph 34, these answering Defendants  
4 reallege and incorporate by reference as set out in full their  
5 answers to the allegations contained in Paragraphs 1 through 33 of  
6 the complaint hereinabove.

7           35. Answering Paragraph 35, these answering Defendants  
8 deny, generally and specifically, each and every allegation set  
9 forth therein.

10           36. Answering Paragraph 36, these answering Defendants  
11 deny, generally and specifically, each and every allegation set  
12 forth therein.

13           37. Answering Paragraph 37, these answering Defendants  
14 deny, generally and specifically, each and every allegation set  
15 forth therein.

16           38. Answering Paragraph 38, these answering Defendants  
17 lack sufficient information and belief and on that basis deny the  
18 allegations set forth therein.

19           39. Answering Paragraph 39, these answering Defendants  
20 lack sufficient information and belief and on that basis deny the  
21 allegations set forth therein.

22           40. Answering Paragraph 40, these answering Defendants  
23 lack sufficient information and belief and on that basis deny the  
24 allegations set forth therein.

25           41. Answering Paragraph 41, these answering Defendants  
26 deny, generally and specifically, each and every allegation set  
27 forth therein.

1           42. Answering Paragraph 42, these answering Defendants  
2 reallege and incorporate by reference as set out in full their  
3 answers to the allegations contained in Paragraphs 1 through 41 of  
4 the complaint hereinabove.

5           43. Answering Paragraph 43, these answering Defendants  
6 deny, generally and specifically, each and every allegation set  
7 forth therein.

8           44. Answering Paragraph 44, these answering Defendants  
9 deny, generally and specifically, each and every allegation set  
10 forth therein.

11           45. Answering Paragraph 45, these answering Defendants  
12 deny, generally and specifically, each and every allegation set  
13 forth therein.

14           46. Answering Paragraph 46, these answering Defendants  
15 reallege and incorporate by reference as set out in full their  
16 answers to the allegations contained in Paragraphs 1 through 45 of  
17 the complaint hereinabove.

18           47. Answering Paragraph 47, these answering Defendants  
19 deny, generally and specifically, each and every allegation set  
20 forth therein.

21           48. Answering Paragraph 48 these answering Defendants  
22 deny, generally and specifically, each and every allegation set  
23 forth therein.

24           49. Answering Paragraph 49, these answering Defendants  
25 deny, generally and specifically, each and every allegation set  
26 forth therein.

27           50. Answering Paragraph 51 these answering Defendants  
28

1 deny, generally and specifically, each and every allegation set  
2 forth therein.

3           51. Answering Paragraph 51, these answering Defendants  
4 lack sufficient information and belief and on that basis deny the  
5 allegations set forth therein.

6           52. Answering Paragraph 52 these answering Defendants  
7 deny, generally and specifically, each and every allegation set  
8 forth therein.

9           53. Answering Paragraph 53, these answering Defendants  
10 reallege and incorporate by reference as set out in full their  
11 answers to the allegations contained in Paragraphs 1 through 51 of  
12 the complaint hereinabove.

13           54. Answering Paragraph 54, these answering Defendants  
14 deny, generally and specifically, each and every allegation set  
15 forth therein.

16           55. Answering Paragraph 55, these answering Defendants  
17 lack sufficient information and belief and on that basis deny the  
18 allegations set forth therein.

19           56. Answering Paragraph 56, these answering Defendants  
20 deny, generally and specifically, each and every allegation set  
21 forth therein.

22                           **AFFIRMATIVE DEFENSES**

23           The Complaint fails to state a claim for relief, and the  
24 Complaint should be dismissed.

25           **WHEREFORE,** the Defendants pray for judgment as follows:

26           1. That Plaintiff takes nothing by virtue of the  
27 complaint herein;

1           2. For judgment in favor of Defendants and adverse to  
2 Plaintiff;

3           3. For reasonable attorney's fees;

4           4. For costs of suit herein; and

5           5. For such other and further relief as is just and  
6 proper.

7  
8 DATED: 1/23/07

/S/ DAVID E. BRITTON  
Attorney for Debtors/Defendants



1 **DAVID E. BRITTON, CLS-B, #75926**  
2 LOCKHART & BRITTON  
3 7777 ALVARADO RD, SUITE 422  
4 LA MESA, CA 91941  
5 (619) 698-6800

6 Attorney for Debtors/Defendants

7  
8 UNITED STATES BANKRUPTCY COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA

10 In Re: ) Case NO. **06-90506-H7**  
11 )  
12 **JEFFREY SCOTT TURPIN** ) **CERTIFICATION OF SERVICE**  
13 ) **BY MAIL**  
14 **BARBARA JEAN TURPIN** )  
15 \_\_\_\_\_ Debtors )

16 I, the undersigned whose business address appears above,  
17 certify:

18 That I am, and at all times hereinafter mentioned was, more than 18  
19 years of age.

20 That on the 23rd day of JANUARY, 2007, I served a true  
21 copy of the annexed papers to wit:

22 **ANSWER TO COMPLAINT TO DETERMINE DISCHARGEABILITY OF DEBT**

23 By first class U.S. Mail, postage prepaid, on,

24  
25 **2J GROUP, INC.**  
26 **c/o PAUL DUVALL**  
27 **KING & BALLOU**  
28 **9404 GENESEE AVE. #340**  
**LA JOLLA, CA 92037**

I declare under penalty of perjury that the foregoing is true and  
correct, executed at La Mesa, California on 1/23/07.

/S/ Madelyn R. Vallone